

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,) NO. CR 10-111
)
vs.) COUNT 1:
)
CHAN GIA DUONG,) 8 U.S.C. § 1324(a)(1)(A)(iii)
)
) 8 U.S.C. § 1324(a)(1)(A)(v)(I) and
)
) 8 U.S.C. § 1324(a)(1)(B)(i)
) **(Conspiracy to Harbor Aliens)**
)
) COUNT 2:
Defendant.) 26 U.S.C. § 7206(1)
) **(Filing False Tax Return)**
)

INFORMATION

The United States Attorney Charges:

COUNT 1

Between about October 2004 and November 2008, in the Northern District of Iowa, and elsewhere, defendant CHAN GIA DUONG, knowingly and intentionally combined, conspired, confederated and agreed with others known and unknown to the United States Attorney to harbor multiple illegal aliens for commercial advantage and personal financial gain knowingly and in reckless disregard of the fact that multiple illegal aliens had come to, entered and remained in the United States in violation of law, by providing employment, transportation and living accommodations.

This in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).

COUNT 2

On or about April 6, 2008, in the Northern District of Iowa, CHAN GIA DUONG, a resident of Vinton, Iowa, did willfully make and subscribe to a Form 1040 for tax year 2007, which contained and was verified by a written declaration that it was made under the penalties of perjury and which CHAN GIA DUONG did not believe to be true and correct as to every material matter. The Form 1040, which was electronically filed with a proper officer of the Internal Revenue Service, stated defendant's adjusted gross income was \$24,252, whereas, as he then and there knew and believed, his true adjusted gross income for tax year 2007 was \$386,763.

In violation of Title 26, United States Code, Section 7206(1).

STEPHANIE M. ROSE
United States Attorney



PATRICK J. REINERT
Assistant United States Attorney